



February 15, 2000

Environmental Permit Service Center  
Maryland Department of the Environment  
2500 Broening HWY  
Baltimore, MD 21224-6601

RE: No Exposure Certification for Exclusion from NPDES Storm Water Permitting

Dear Mr. Gertler:

As per our recent telephone conversation, I have enclosed the EPA forms for No Exposure Certification for Exclusion from NPDES Storm Water Permitting for our four vehicle maintenance facilities. These facilities have storm water permits with the following registration numbers: 95-SW-0744, 95-SW-0745, 95-SW-0746, and 95-SW-0747. Please feel free to call me at 410 347-4277 if you need any additional information. Thank you.

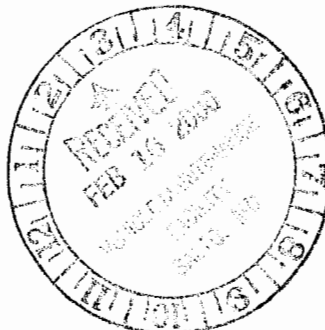
Sincerely,

A handwritten signature in cursive script that reads "Richard H. Hass".

Richard H. Hass  
Environmental Compliance Coordinator (A)

Enclosures: No Exposure Certification for Exclusion from NPDES Storm Water Permitting for four facilities

cc: District Manager, USPS  
Manager, VMF  
Local Municipal Storm Water Department



900 EAST FAYETTE ST ROOM 326  
BALTIMORE MD 21233-9126  
410 347-4277  
FAX: 410 234-8578

**NO EXPOSURE CERTIFICATION for Exclusion from  
NPDES Storm Water Permitting**

Submission of this No Exposure Certification constitutes notice that the entity identified in Section A does not require permit authorization for its storm water discharges associated with industrial activity in the State identified in Section B under EPA's Storm Water Multi-Sector General Permit due to the existence of a condition of no exposure.

A condition of no exposure exists at an industrial facility when all industrial materials and activities are protected by a storm resistant shelter to prevent exposure to rain, snow, snowmelt, and/or runoff. Industrial materials or activities include, but are not limited to, material handling equipment or activities, industrial machinery, raw materials, intermediate products, by-products, final products, or waste products. Material handling activities include the storage, loading and unloading, transportation, or conveyance of any raw material, intermediate product, final product or waste product. A storm resistant shelter is not required for the following industrial materials and activities:

- drums, barrels, tanks, and similar containers that are tightly sealed, provided those containers are not deteriorated and do not leak. "Sealed" means banded or otherwise secured and without operational taps or valves;
- adequately maintained vehicles used in material handling; and
- final products, other than products that would be mobilized in storm water discharges (e.g., rock salt).

A No Exposure Certification must be provided for each facility qualifying for the no exposure exclusion. In addition, the exclusion from NPDES permitting is available on a facility-wide basis only, not for individual outfalls. If any industrial activities or materials are or will be exposed to precipitation, the facility is not eligible for the no exposure exclusion.

By signing and submitting this No Exposure Certification form, the entity in Section A is certifying that a condition of no exposure exists at its facility or site, and is obligated to comply with the terms and conditions of 40 CFR 122.26(g).

ALL INFORMATION MUST BE PROVIDED ON THIS FORM.

Detailed instructions for completing this form and obtaining the no exposure exclusion are provided on pages 3 and 4.

**A. Facility Operator Information**

1. Name: UNITED STATES POSTAL SERVICE 2. Phone: 4103474268  
3. Mailing Address: a. Street: 9101 EASIT FAIRFIELD STREET  
b. City: BALTIMORE c. State: MD d. Zip Code: 21233-1998

**B. Facility/Site Location Information**

1. Facility Name: VEHICLE MAINTENANCE FACILITY  
2. a. Street Address: 601 WEISITOLIVE STREET  
b. City: BALTIMORE c. County: BALTIMORE  
d. State: MD e. Zip Code: 21201-9351  
3. Is the facility located on Indian Lands? Yes ☐ No ☒  
4. Is this a Federal facility? Yes ☒ No ☐  
5. a. Latitude: 39° 18' 30" b. Longitude: 76° 37' 00"  
6. a. Was the facility or site previously covered under an NPDES storm water permit? Yes ☒ No ☐  
b. If yes, enter NPDES permit number: 95-SW-0747  
7. SIC/Activity Codes: Primary: 4311 Secondary (if applicable): 7538  
8. Total size of site associated with industrial activity: 3.34 acres  
9. a. Have you paved or roofed over a formerly exposed, pervious area in order to qualify for the no exposure exclusion? Yes ☐ No ☒  
b. If yes, please indicate approximately how much area was paved or roofed over. Completing this question does not disqualify you for the no exposure exclusion. However, your permitting authority may use this information in considering whether storm water discharges from your site are likely to have an adverse impact on water quality, in which case you could be required to obtain permit coverage.  
Less than one acre ☐ One to five acres ☐ More than five acres ☐

NO EXPOSURE CERTIFICATION for Exclusion from  
NPDES Storm Water Permitting

## C. Exposure Checklist

Are any of the following materials or activities exposed to precipitation, now or in the foreseeable future?  
(Please check either "Yes" or "No" in the appropriate box.) If you answer "Yes" to any of these questions  
(1) through (11), you are not eligible for the no exposure exclusion.

Yes No

- |  |                          |                                     |
|--|--------------------------|-------------------------------------|
| 1. Using, storing or cleaning industrial machinery or equipment, and areas where residuals from using, storing or cleaning industrial machinery or equipment remain and are exposed to storm water | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 2. Materials or residuals on the ground or in storm water inlets from spills/leaks   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 3. Materials or products from past industrial activity   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 4. Material handling equipment (except adequately maintained vehicles)   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 5. Materials or products during loading/unloading or transporting activities   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 6. Materials or products stored outdoors (except final products intended for outside use [e.g., new cars] where exposure to storm water does not result in the discharge of pollutants)            | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 7. Materials contained in open, deteriorated or leaking storage drums, barrels, tanks, and similar containers  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 8. Materials or products handled/stored on roads or railways owned or maintained by the discharger   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 9. Waste material (except waste in covered, non-leaking containers [e.g., dumpsters])  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 10. Application or disposal of process wastewater (unless otherwise permitted)   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 11. Particulate matter or visible deposits of residuals from roof stacks and/or vents not otherwise regulated (i.e., under an air quality control permit) and evident in the storm water outflow   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

## D. Certification Statement

I certify under penalty of law that I have read and understand the eligibility requirements for claiming a condition of "no exposure" and obtaining an exclusion from NPDES storm water permitting.

I certify under penalty of law that there are no discharges of storm water contaminated by exposure to industrial activities or materials from the industrial facility or site identified in this document (except as allowed under 40 CFR 122.26(g)(2)).

I understand that I am obligated to submit a no exposure certification form once every five years to the NPDES permitting authority and, if requested, to the operator of the local municipal separate storm sewer system (MS4) into which the facility discharges (where applicable). I understand that I must allow the NPDES permitting authority, or MS4 operator where the discharge is into the local MS4, to perform inspections to confirm the condition of no exposure and to make such inspection reports publicly available upon request. I understand that I must obtain coverage under an NPDES permit prior to any point source discharge of storm water from the facility.

Additionally, I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Print Name: N E R R Y I D I L A N I EPrint Title: D I S T R I C T M A N A G E RSignature: Date: 012114010

**NO EXPOSURE CERTIFICATION for Exclusion from  
NPDES Storm Water Permitting**

Submission of this No Exposure Certification constitutes notice that the entity identified in Section A does not require permit authorization for its storm water discharges associated with industrial activity in the State identified in Section B under EPA's Storm Water Multi-Sector General Permit due to the existence of a condition of no exposure.

A condition of no exposure exists at an industrial facility when all industrial materials and activities are protected by a storm resistant shelter to prevent exposure to rain, snow, snowmelt, and/or runoff. Industrial materials or activities include, but are not limited to, material handling equipment or activities, industrial machinery, raw materials, intermediate products, by-products, final products, or waste products. Material handling activities include the storage, loading and unloading, transportation, or conveyance of any raw material, intermediate product, final product or waste product. A storm resistant shelter is not required for the following industrial materials and activities:

- drums, barrels, tanks, and similar containers that are tightly sealed, provided those containers are not deteriorated and do not leak. "Sealed" means banded or otherwise secured and without operational taps or valves;
- adequately maintained vehicles used in material handling; and
- final products, other than products that would be mobilized in storm water discharges (e.g., rock salt).

A No Exposure Certification must be provided for each facility qualifying for the no exposure exclusion. In addition, the exclusion from NPDES permitting is available on a facility-wide basis only, not for individual outfalls. If any industrial activities or materials are or will be exposed to precipitation, the facility is not eligible for the no exposure exclusion.

By signing and submitting this No Exposure Certification form, the entity in Section A is certifying that a condition of no exposure exists at its facility or site, and is obligated to comply with the terms and conditions of 40 CFR 122.26(g).

ALL INFORMATION MUST BE PROVIDED ON THIS FORM.

Detailed Instructions for completing this form and obtaining the no exposure exclusion are provided on pages 3 and 4.

**A. Facility Operator Information**

1. Name: UNIFIED INDUSTRIAL SERVICES 2. Phone: 410-317-4268  
3. Mailing Address: a. Street: 9101 EASIE FAYETTE  
b. City: BALTIMORE c. State: MD d. Zip Code: 21231-1918

**B. Facility/Site Location Information**

1. Facility Name: VEHICLE MAINTENANCE FACILITY  
2. a. Street Address: 8210 HARFORD ROAD  
b. City: BALTIMORE c. County: BALTIMORE  
d. State: MD e. Zip Code: 21234-1912  
3. Is the facility located on Indian Lands? Yes ☐ No ☒  
4. Is this a Federal facility? Yes ☒ No ☐  
5. a. Latitude: 39° 22' 45" b. Longitude: 76° 32' 15"  
6. a. Was the facility or site previously covered under an NPDES storm water permit? Yes ☒ No ☐  
b. If yes, enter NPDES permit number: 95-SW-0745  
7. SIC/Activity Codes: Primary: 4311 Secondary (if applicable): 7538  
8. Total size of site associated with industrial activity: .3 acres  
9. a. Have you paved or roofed over a formerly exposed, pervious area in order to qualify for the no exposure exclusion? Yes ☐ No ☒  
b. If yes, please indicate approximately how much area was paved or roofed over. Completing this question does not disqualify you for the no exposure exclusion. However, your permitting authority may use this information in considering whether storm water discharges from your site are likely to have an adverse impact on water quality, in which case you could be required to obtain permit coverage.  
Less than one acre ☐ One to five acres ☐ More than five acres ☐

NO EXPOSURE CERTIFICATION for Exclusion from  
NPDES Storm Water Permitting

## C. Exposure Checklist

Are any of the following materials or activities exposed to precipitation, now or in the foreseeable future?  
(Please check either "Yes" or "No" in the appropriate box.) If you answer "Yes" to any of these questions  
(1) through (11), you are not eligible for the no exposure exclusion.

	Yes	No
1. Using, storing or cleaning industrial machinery or equipment, and areas where residuals from using, storing or cleaning industrial machinery or equipment remain and are exposed to storm water	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2. Materials or residuals on the ground or in storm water inlets from spills/leaks	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. Materials or products from past industrial activity	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4. Material handling equipment (except adequately maintained vehicles)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5. Materials or products during loading/unloading or transporting activities	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6. Materials or products stored outdoors (except final products intended for outside use [e.g., new cars] where exposure to storm water does not result in the discharge of pollutants)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7. Materials contained in open, deteriorated or leaking storage drums, barrels, tanks, and similar containers	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8. Materials or products handled/stored on roads or railways owned or maintained by the discharger	<input type="checkbox"/>	<input checked="" type="checkbox"/>
9. Waste material (except waste in covered, non-leaking containers [e.g., dumpsters])	<input type="checkbox"/>	<input checked="" type="checkbox"/>
10. Application or disposal of process wastewater (unless otherwise permitted)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
11. Particulate matter or visible deposits of residuals from roof stacks and/or vents not otherwise regulated (i.e., under an air quality control permit) and evident in the storm water outflow	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## D. Certification Statement

I certify under penalty of law that I have read and understand the eligibility requirements for claiming a condition of "no exposure" and obtaining an exclusion from NPDES storm water permitting.

I certify under penalty of law that there are no discharges of storm water contaminated by exposure to industrial activities or materials from the industrial facility or site identified in this document (except as allowed under 40 CFR 122.26(g)(2)).

I understand that I am obligated to submit a no exposure certification form once every five years to the NPDES permitting authority and, if requested, to the operator of the local municipal separate storm sewer system (MS4) into which the facility discharges (where applicable). I understand that I must allow the NPDES permitting authority, or MS4 operator where the discharge is into the local MS4, to perform inspections to confirm the condition of no exposure and to make such inspection reports publicly available upon request. I understand that I must obtain coverage under an NPDES permit prior to any point source discharge of storm water from the facility.

Additionally, I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Print Name: J E R R Y D L A N I E

Print Title: D I S T R I C T M A N A G E R

Signature: 

Date: 8/1/00

**NO EXPOSURE CERTIFICATION for Exclusion from  
NPDES Storm Water Permitting**

Submission of this No Exposure Certification constitutes notice that the entity identified in Section A does not require permit authorization for its storm water discharges associated with industrial activity in the State identified in Section B under EPA's Storm Water Multi-Sector General Permit due to the existence of a condition of no exposure.

A condition of no exposure exists at an industrial facility when all industrial materials and activities are protected by a storm resistant shelter to prevent exposure to rain, snow, snowmelt, and/or runoff. Industrial materials or activities include, but are not limited to, material handling equipment or activities, industrial machinery, raw materials, intermediate products, by-products, final products, or waste products. Material handling activities include the storage, loading and unloading, transportation, or conveyance of any raw material, intermediate product, final product or waste product. A storm resistant shelter is not required for the following industrial materials and activities:

- drums, barrels, tanks, and similar containers that are tightly sealed, provided those containers are not deteriorated and do not leak. "Sealed" means banded or otherwise secured and without operational taps or valves;
- adequately maintained vehicles used in material handling; and
- final products, other than products that would be mobilized in storm water discharges (e.g., rock salt).

A No Exposure Certification must be provided for each facility qualifying for the no exposure exclusion. In addition, the exclusion from NPDES permitting is available on a facility-wide basis only, not for individual outfalls. If any industrial activities or materials are or will be exposed to precipitation, the facility is not eligible for the no exposure exclusion.

By signing and submitting this No Exposure Certification form, the entity in Section A is certifying that a condition of no exposure exists at its facility or site, and is obligated to comply with the terms and conditions of 40 CFR 122.26(g).

ALL INFORMATION MUST BE PROVIDED ON THIS FORM.

Detailed Instructions for completing this form and obtaining the no exposure exclusion are provided on pages 3 and 4.

**A. Facility Operator Information**

1. Name: UNITED STATES POSTAL SERVICE 2. Phone: 4103474268  
3. Mailing Address: a. Street: 900 EASIT PLAZETTE STREET  
b. City: BALTIMORE c. State: MD d. Zip Code: 21233-1998

**B. Facility/Site Location Information**

1. Facility Name: VEHICLE MAINTENANCE FACILITY  
2. a. Street Address: 6801 PARK HILL LANE  
b. City: COLUMBIA c. County: HOWARD  
d. State: MD e. Zip Code: 21045-1998  
3. Is the facility located on Indian Lands? Yes ☐ No ☒  
4. Is this a Federal facility? Yes ☒ No ☐  
5. a. Latitude: 39° 11' 15" b. Longitude: 76° 40' 15"  
6. a. Was the facility or site previously covered under an NPDES storm water permit? Yes ☒ No ☐  
b. If yes, enter NPDES permit number: 95-SW-0744  
7. SIC/Activity Codes: Primary: 4311 Secondary (if applicable): 7538  
8. Total size of site associated with industrial activity: .3 acres  
9. a. Have you paved or roofed over a formerly exposed, pervious area in order to qualify for the no exposure exclusion? Yes ☐ No ☒  
b. If yes, please indicate approximately how much area was paved or roofed over. Completing this question does not disqualify you for the no exposure exclusion. However, your permitting authority may use this information in considering whether storm water discharges from your site are likely to have an adverse impact on water quality, in which case you could be required to obtain permit coverage.  
Less than one acre ☐ One to five acres ☐ More than five acres ☐

NO EXPOSURE CERTIFICATION for Exclusion from  
NPDES Storm Water Permitting

## C. Exposure Checklist

Are any of the following materials or activities exposed to precipitation, now or in the foreseeable future?  
(Please check either "Yes" or "No" in the appropriate box.) If you answer "Yes" to any of these questions  
(1) through (11), you are not eligible for the no exposure exclusion.

	Yes	No
1. Using, storing or cleaning industrial machinery or equipment, and areas where residuals from using, storing or cleaning industrial machinery or equipment remain and are exposed to storm water	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2. Materials or residuals on the ground or in storm water inlets from spills/leaks	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. Materials or products from past industrial activity	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4. Material handling equipment (except adequately maintained vehicles)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5. Materials or products during loading/unloading or transporting activities	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6. Materials or products stored outdoors (except final products intended for outside use [e.g., new cars] where exposure to storm water does not result in the discharge of pollutants)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7. Materials contained in open, deteriorated or leaking storage drums, barrels, tanks, and similar containers	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8. Materials or products handled/stored on roads or railways owned or maintained by the discharger	<input type="checkbox"/>	<input checked="" type="checkbox"/>
9. Waste material (except waste in covered, non-leaking containers [e.g., dumpsters])	<input type="checkbox"/>	<input checked="" type="checkbox"/>
10. Application or disposal of process wastewater (unless otherwise permitted)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
11. Particulate matter or visible deposits of residuals from roof stacks and/or vents not otherwise regulated (i.e., under an air quality control permit) and evident in the storm water outflow	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## D. Certification Statement

I certify under penalty of law that I have read and understand the eligibility requirements for claiming a condition of "no exposure" and obtaining an exclusion from NPDES storm water permitting.

I certify under penalty of law that there are no discharges of storm water contaminated by exposure to industrial activities or materials from the industrial facility or site identified in this document (except as allowed under 40 CFR 122.26(g)(2)).

I understand that I am obligated to submit a no exposure certification form once every five years to the NPDES permitting authority and, if requested, to the operator of the local municipal separate storm sewer system (MS4) into which the facility discharges (where applicable). I understand that I must allow the NPDES permitting authority, or MS4 operator where the discharge is into the local MS4, to perform inspections to confirm the condition of no exposure and to make such inspection reports publicly available upon request. I understand that I must obtain coverage under an NPDES permit prior to any point source discharge of storm water from the facility.

Additionally, I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Print Name: J E R R Y D L A N E

Print Title: D I S T R I C T M A N A G E R

Signature: 

Date: 8/1/99

**NO EXPOSURE CERTIFICATION for Exclusion from  
NPDES Storm Water Permitting**

Submission of this No Exposure Certification constitutes notice that the entity identified in Section A does not require permit authorization for its storm water discharges associated with industrial activity in the State identified in Section B under EPA's Storm Water Multi-Sector General Permit due to the existence of a condition of no exposure.

A condition of no exposure exists at an industrial facility when all industrial materials and activities are protected by a storm resistant shelter to prevent exposure to rain, snow, snowmelt, and/or runoff. Industrial materials or activities include, but are not limited to, material handling equipment or activities, industrial machinery, raw materials, intermediate products, by-products, final products, or waste products. Material handling activities include the storage, loading and unloading, transportation, or conveyance of any raw material, intermediate product, final product or waste product. A storm resistant shelter is not required for the following industrial materials and activities:

- drums, barrels, tanks, and similar containers that are tightly sealed, provided those containers are not deteriorated and do not leak. "Sealed" means banded or otherwise secured and without operational taps or valves;
- adequately maintained vehicles used in material handling; and
- final products, other than products that would be mobilized in storm water discharges (e.g., rock salt).

A No Exposure Certification must be provided for each facility qualifying for the no exposure exclusion. In addition, the exclusion from NPDES permitting is available on a facility-wide basis only, not for individual outfalls. If any industrial activities or materials are or will be exposed to precipitation, the facility is not eligible for the no exposure exclusion.

By signing and submitting this No Exposure Certification form, the entity in Section A is certifying that a condition of no exposure exists at its facility or site, and is obligated to comply with the terms and conditions of 40 CFR 122.26(g).

ALL INFORMATION MUST BE PROVIDED ON THIS FORM.

Detailed Instructions for completing this form and obtaining the no exposure exclusion are provided on pages 3 and 4.

**A. Facility Operator Information**

1. Name: UNITED STATES INDUSTRIAL SERVICE 2. Phone: 4103474268  
3. Mailing Address: a. Street: 9101 EAST FAIRVIEW STREET  
b. City: BALTIMORE c. State: MD d. Zip Code: 21231-1918

**B. Facility/Site Location Information**

1. Facility Name: VEHICLE MAINTENANCE FACILITY  
2. a. Street Address: 61 WILKINSON AVENUE  
b. City: BALTIMORE c. County: BALTIMORE  
d. State: MD e. Zip Code: 21227-1918  
3. Is the facility located on Indian Lands? Yes ☐ No ☒  
4. Is this a Federal facility? Yes ☒ No ☐  
5. a. Latitude: 39° 14' 45" b. Longitude: 76° 41' 30"  
6. a. Was the facility or site previously covered under an NPDES storm water permit? Yes ☒ No ☐  
b. If yes, enter NPDES permit number: 95-SW-0746  
7. SIC/Activity Codes: Primary: 4311 Secondary (if applicable): 7538  
8. Total size of site associated with industrial activity: .3 acres  
9. a. Have you paved or roofed over a formerly exposed, pervious area in order to qualify for the no exposure exclusion? Yes ☐ No ☒  
b. If yes, please indicate approximately how much area was paved or roofed over. Completing this question does not disqualify you for the no exposure exclusion. However, your permitting authority may use this information in considering whether storm water discharges from your site are likely to have an adverse impact on water quality, in which case you could be required to obtain permit coverage.  
Less than one acre ☐ One to five acres ☐ More than five acres ☐



NO EXPOSURE CERTIFICATION for Exclusion from  
NPDES Storm Water Permitting

## C. Exposure Checklist

Are any of the following materials or activities exposed to precipitation, now or in the foreseeable future?  
(Please check either "Yes" or "No" in the appropriate box.) If you answer "Yes" to any of these questions  
(1) through (11), you are not eligible for the no exposure exclusion.

Yes No

- |  |                          |                                     |
|--|--------------------------|-------------------------------------|
| 1. Using, storing or cleaning industrial machinery or equipment, and areas where residuals from using, storing or cleaning industrial machinery or equipment remain and are exposed to storm water | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 2. Materials or residuals on the ground or in storm water inlets from spills/leaks   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 3. Materials or products from past industrial activity   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 4. Material handling equipment (except adequately maintained vehicles)   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 5. Materials or products during loading/unloading or transporting activities   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 6. Materials or products stored outdoors (except final products intended for outside use [e.g., new cars] where exposure to storm water does not result in the discharge of pollutants)            | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 7. Materials contained in open, deteriorated or leaking storage drums, barrels, tanks, and similar containers  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 8. Materials or products handled/stored on roads or railways owned or maintained by the discharger   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 9. Waste material (except waste in covered, non-leaking containers [e.g., dumpsters])  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 10. Application or disposal of process wastewater (unless otherwise permitted)   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 11. Particulate matter or visible deposits of residuals from roof stacks and/or vents not otherwise regulated (i.e., under an air quality control permit) and evident in the storm water outflow   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

## D. Certification Statement

I certify under penalty of law that I have read and understand the eligibility requirements for claiming a condition of "no exposure" and obtaining an exclusion from NPDES storm water permitting.

I certify under penalty of law that there are no discharges of storm water contaminated by exposure to industrial activities or materials from the industrial facility or site identified in this document (except as allowed under 40 CFR 122.26(g)(2)).

I understand that I am obligated to submit a no exposure certification form once every five years to the NPDES permitting authority and, if requested, to the operator of the local municipal separate storm sewer system (MS4) into which the facility discharges (where applicable). I understand that I must allow the NPDES permitting authority, or MS4 operator where the discharge is into the local MS4, to perform inspections to confirm the condition of no exposure and to make such inspection reports publicly available upon request. I understand that I must obtain coverage under an NPDES permit prior to any point source discharge of storm water from the facility.

Additionally, I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Print Name: J E R R Y I D I L A N I E

Print Title: D I S T R I B U T I O N M A N A G E R

Signature: 

Date: 11/1/00

MDE

MARYLAND DEPARTMENT OF THE ENVIRONMENT

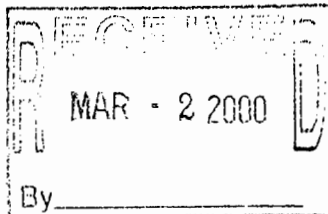
2500 Broening Highway • Baltimore Maryland 21224  
(410) 631-3000 • 1-800-633-6101 • <http://www.mde.state.md.us>

Parris N. Glendening  
Governor

Jane T. Nishida  
Secretary

February 28, 2000

Jerry Lane  
United States Postal Service  
900 East Fayette Street  
Baltimore MD 21233-9998



Dear Mr. Lane:

The Maryland Department of the Environment has received your No Exposure Certifications for Exclusion from National Pollutant Discharge Elimination System (NPDES) Storm Water Permitting. In signing these documents, you have certified that the facilities located at 6801 Oak Hall Lane, Columbia MD; 8210 Harford Road, Baltimore; 6 Waelchi Avenue, Baltimore; and 60 West Oliver Street, Baltimore do not need an NPDES permit for its storm water according to the criteria established in 40 CFR 122.26 (Code of Federal Regulations), which implement requirements under the federal Clean Water Act.

Please note that the above regulations require that you resubmit this certification no later than five years from the date of your present certification if storm water exposure conditions at the above-referenced facility remain the same. If you later determine that potential for exposure exists, you must submit a notice of intent for coverage under the State's general permit for storm water associated with industrial activity. In the meantime, inspectors from the Department may call on you to verify the terms of your certifications.

If you have any questions, please do not hesitate to call me at (410) 631-3323.

Sincerely,

Edward Gertler, Technical Advisor  
Industrial Discharge Permits Division  
Wastewater Permits Program

cc: Paul Stoner, Compliance Program, MDE (Baltimore City, Howard and Baltimore Counties)

U.S. Postal Service  
**Routing Slip**

To	Dept., Office or Room No.	<input type="checkbox"/> Approval <input type="checkbox"/> Signature <input type="checkbox"/> Comment <input type="checkbox"/> See Me <input type="checkbox"/> As Requested <input type="checkbox"/> Information <input type="checkbox"/> Read and Return <input type="checkbox"/> Read and File <input type="checkbox"/> Necessary Action <input type="checkbox"/> Investigate <input type="checkbox"/> Recommendation <input type="checkbox"/> Prepare Reply
1. Len Peters, VMF Oliver St		
2. Tim Dickerson, VMF Columbia		
3. David Brown, VMF Halethorpe		
4. Larry Wasserman, VMF Parkville		
5.		
6.		

From: Rick Hass Environmental Compliance Coordinator (A)	Extension 410-347-4277
Date 03/13/00	Room No. 326

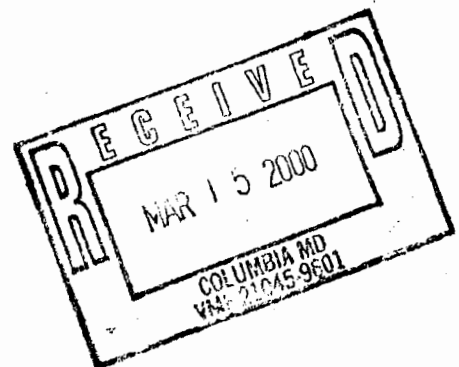
Remarks

Enclosed is the letter from the MDE granting the VMF's exclusion from National Pollutant Discharge Elimination System Storm Water Permitting. Please keep in the file with the current permit. Also, remember that in order to keep this exclusion, all industrial activities at the VMF's must remain indoors and have no exposure to stormwater.

Thanks,



Rick



**Central Division**  
**Montgomery Park Business Center**  
**1800 Washington Boulevard, Ste 425**  
**Baltimore, MD 21230-1708**

**Field Inspection Report by:** Frank Ciurca

**Permit / Approval Numbers:** 97-SW-0747

**Date/Time:** 11/24/2003

**Facility Address:** 60 West Oliver St  
 Baltimore, Md 21233

**Site Name:** USPS- Baltimore Vehicle  
 Maintenance Facility

**Site Status:** Currently Active

**Permit Type:** Industrial NPDES/Discharge  
 Permit

**Site Condition:** Corrections needed

**Contact(s):** Leonard Peters, USPS Mgr  
 Donald Powell, USPS  
 Gerald Critchley, US EPA  
 Specialist  
 Jose Jimenez, US EPA Fed Fac. Co

**Recommended Action:** Continue routine investigation  
 Warning

**Evidence Collected:** VISUAL OBSERVATION  
 GRAPHIC, PHOTO, etc.

**Inspection Reason:** Routine Scheduled  
 Initial Inspection for Current Fiscal Year

### INSPECTION FINDINGS

A joint US EPA/MDE inspection of the USPS- Baltimore Veh. Maintenance Facility was conducted this date and resulted in the following observations on the water side:

- Mr. Crutchley, Mr. Jimenez of the EPA, and myself met with USPS Mgr Mr. Peters, and Mr. Powell. We discussed the facility, and its relationship to the various EPA regulated programs. In particular the past 97-SW-0747 permit was discussed. On Feb 15, 2000, USPS Env. Coordinator filed a Non Exposure exclusion for the Facility as well as No Exposures for the Columbia, Parkville, and Halethorpe Facilities. Therefore the Baltimore Veh. Maintenance Facility had no 02-SW coverage. The facility works on 1400 vehicles including LLVs, tractor trailers, cargo vans. Some vehicles are stored on site awaiting maintenance. I received information this date from Ed Gertler, MDE Industrial Permits coordinator, that vehicle maint. shops where trucks are stored are not exempt from the 02-SW General Industrial Permit, therefore within 14 days, the USPS must obtain 02-SW coverage under the General Industrial Permit. The Facility must also develop a stormwater pollution prevention plan(SWPPP) within 30 days as required by the plan. The plan will require an annual site evaluation and training of personnel.

The facility has approx. 5 in door inlets as well as a wash booth for vehicle cleaning. They are tied into a common line then to an oil/water separator. No other sources of water were noted that discharge to the storm drains of Balto City.

- A tour of the outdoor and indoor facilities was conducted with the following stormwater issues noted:

**Permit / Approval Numbers:** 97-SW-0747

**Date/Time:** 11/24/2003


**Facility Address:** 60 West Oliver St  
Baltimore, Md 21233

-There was a discharge of oil/antifreeze products noted from 2 work bays which then discharged to an outside parking lot storm drain. Mr. Peters determined that the indoor bays were washed out toward the outside doors. He stated that the bays should have been washed toward the internal storm drains. A small berm must be constructed across the bay access's as discussed to stop the discharge of oil/antifreeze products. This should be performed ASAP. The discharge of oil/antifreeze or other pollutants to outside storm drains and waters of the state is a violation of Env. Article 9-322, Discharge of Pollutants prohibited.


- The internal storm drains and oil/water separator were inspected. The lid of the separator was removed and did not appear to have any maintenance performed recently, heavy sed. was noted on the lid. Within 14 days, Mr. Peters will also hire a Company to come in and certify that internal storm drains are connected to the sanitary sewer. If the drains are not tied to the sanitary lines, they must be connected immediately. There is a discharge of wash water from the veh. washing facility, which must go to the sanitary sewer.

Mr. Peters will also determine the need for 02-SW coverage for the other veh. maintenance facilities in Md, after consulting with Ed Gertler. I will follow-up within the next 30 days for stormwater issues noted above. A copy of this report was issued to the USPS and EPA. Photos were taken by the EPA.

Inspector:

  
Frank Ciurca

Received by:





*Len Peters*

# MARYLAND DEPARTMENT OF THE ENVIRONMENT

2500 Broening Highway • Baltimore Maryland 21224  
(410) 631-3000 • 1-800-633-6101 • <http://www.mde.state.md.us>

Parris N. Glendening  
Governor

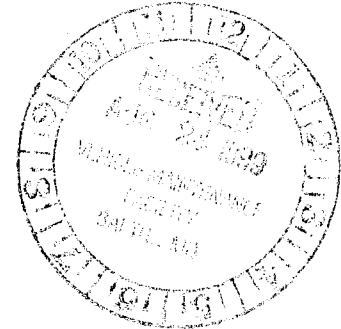
Jane T. Nishida  
Secretary

July 28, 1999

## NOTICE OF COMPLIANCE

Mr. Robert Williams  
U.S. Postal Service  
Suite 400  
10400 Little Patuxent Parkway  
Columbia MD 21044-3510

**RE: Case Nos. 93-0213 and 99-2153 BC2**  
**U.S. Post Office**  
**60 West Oliver Street**  
**Baltimore, Maryland**  
**Facility I.D. No. 0007084**



Dear Mr. Williams:

A representative of the Waste Management Administration's Oil Control Program recently reviewed the Administration's case files concerning the above-referenced facility. Based on this review, it has been determined that 15 underground storage tanks have been removed; and 10 monitoring wells have been installed and sampled. The Administration does not require further corrective action at this facility based on the absence of liquid phase hydrocarbons in the monitoring wells and site characteristics. Thus, the above-referenced property is now in compliance with Code of Maryland Regulations 26.10.09.03A(6)-(7) and 26.10.10.02-.03. The Administration hereby closes its cases in reference to this site.

The monitoring wells may be abandoned in compliance with Code of Maryland Regulation 26.04.04. We recommend that you contact the Baltimore City Health Department at 410-396-4422 concerning the well abandonments. This notice should not be construed as a waiver of the Administration's right to take enforcement action in regards to activities not addressed by the referenced cases. Please be advised that you are responsible for completing and updating the registration information filed with the Department regarding the installation, upgrade, or closure of underground storage systems. Please feel free to contact the Oil Control Program if you have any questions concerning this matter at 410-631-3442.

Sincerely,

Thomas L. Walter, Region II Section Head  
Compliance/Remediation Division  
Oil Control Program

GTT/nlb

cc: Ms. Devon C. Payne-Sturges  
Mr. Richard Collins  
Mr. Herbert Meade

**RECEIVED**

JUL 30 1999

CAPITAL METRO FSO



Parris N. Glendening  
Governor

Jane T. Nishida  
Secretary

Facility No. 0007084



Richard W. Collins, Director  
Waste Management Administration

Horacio Tablada, Administrator  
Oil Control Program

# State of Maryland

Department of the Environment  
Waste Management Administration  
Oil Control Program

## UNDERGROUND STORAGE TANK REGISTRATION CERTIFICATE OF CLOSURE

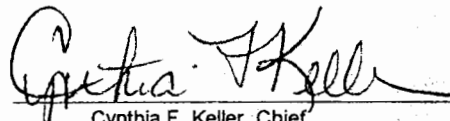
Issued: April 2, 1999

This certifies that **U. S. Postal Service**

has duly amended their Underground Storage Tank registration as required by Code of Maryland Regulation 26.10.03.09, to show the closure of underground storage tank system(s) located at the following location:

Facility Address:

USPS Baltimore Vehicle Maintenance Facility  
60 West Oliver Street  
Baltimore, MD 21201

  
Cynthia F. Keller, Chief  
Office of Resource Management  
Oil Control Program

This certificate replaces the Certificate of Registration issued to you on August 3, 1998. If in the future you decide to install new underground storage tanks, you are required to file an amended underground storage tank registration form as required by Environment Article Section 4-411.1, Annotated Code of Maryland.

TANK NUMBER	STATUS	DESCRIPTION	SUBSTANCE STORED	CLOSURE STATUS
001	Permanently Out of Use	5,000 gal. Gasoline		Tank removed from ground
002	Permanently Out of Use	5,000 gal. Gasoline		Tank removed from ground
003	Permanently Out of Use	6,000 gal. Diesel		Tank removed from ground
004	Permanently Out of Use	550 gal. Other		Tank removed from ground



Parris N. Glendening  
Governor

Jane T. Nishida  
Secretary

Facility No. 0007084



Richard W. Collins, Director  
Waste Management Administration

Horacio Tablada, Administrator  
Oil Control Program

# State of Maryland

Department of the Environment  
Waste Management Administration  
Oil Control Program

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TANK NUMBER	STATUS	DESCRIPTION	SUBSTANCE STORED	CLOSURE STATUS
005	Permanently Out of Use	550 gal. Other		Tank removed from ground
006	Permanently Out of Use	1,000 gal. Used Oil		Tank removed from ground
007	Permanently Out of Use	6,000 gal. Heating Oil		Tank closed in place
008	Permanently Out of Use	10,000 gal. Diesel		Tank removed from ground



Parris N. Glendening  
Governor

Jane T. Nishida  
Secretary

Facility No. 0007084



Richard W. Collins, Director  
Waste Management Administration

Horacio Tablada, Administrator  
Oil Control Program

# State of Maryland

Department of the Environment  
Waste Management Administration  
Oil Control Program

## UNDERGROUND STORAGE TANK REGISTRATION

### CERTIFICATE OF CLOSURE

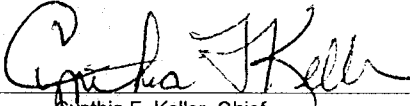
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USPS Baltimore Vehicle Maintenance Facility  
60 West Oliver Street  
Baltimore, MD 21201

  
Cynthia F. Keller, Chief  
Office of Resource Management  
Oil Control Program

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TANK NUMBER	STATUS	DESCRIPTION	SUBSTANCE STORED	CLOSURE STATUS
009	Permanently Out of Use	5,000 gal. Gasoline		Tank removed from ground
010	Permanently Out of Use	550 gal. Used Oil		Tank closed in place

Parris N. Glendening  
Governor

Jane T. Nishida  
Secretary

Facility No. 0007084



Richard W. Collins, Director  
Waste Management Administration

Horacio Tablada, Administrator  
Oil Control Program

# State of Maryland

## Department of the Environment Waste Management Administration

### Oil Control Program UNDERGROUND STORAGE TANK FACILITY CERTIFICATE OF REGISTRATION

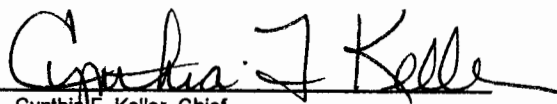
Issued: August 3, 1998

This certifies that **U. S. Postal Service**

has duly registered its underground storage tank system(s) with the State of Maryland, Department of the Environment as required by Environment Article Section 4-411.1, *Annotated Code of Maryland* for the following location:

Facility Address:

USPS Baltimore Vehicle Maintenance Facility  
60 West Oliver Street  
Baltimore, MD 21201

  
Cynthia F. Keller, Chief  
Office of Resource Management  
Oil Control Program

This certificate authorizes the use of the listed underground storage tank system(s) only in accordance with Code of Maryland Regulations (COMAR) 26.10.

The following tank(s) have been duly registered at the above facility:

TANK NUMBER	STATUS	DESCRIPTION	SUBSTANCE STORED	CLOSURE STATUS
007	Permanently Out of Use	6,000 gal.	Heating Oil	Tank closed in place
008	Currently In Use	10,000 gal.	Diesel	
009	Currently In Use	5,000 gal.	Gasoline	

Parris N. Glendening  
Governor

Jane T. Nishida  
Secretary

Facility No. 0007084



Richard W. Collins, Director  
Waste Management Administration

Horacio Tablada, Administrator  
Oil Control Program

# State of Maryland

Department of the Environment  
Waste Management Administration

Oil Control Program  
**UNDERGROUND STORAGE TANK FACILITY  
CERTIFICATE OF REGISTRATION**

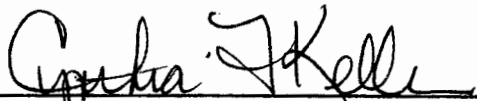
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003	Permanently Out of Use	6,000 gal.	Diesel	Tank removed from ground
004	Permanently Out of Use	550 gal.	Other	Tank removed from ground

8

**UNITED STATES POSTAL SERVICES  
PERMIT TO CONSTRUCT CONDITIONS  
PERMIT NUMBER 24-6-1502 N**

- (e) COMAR 26.11.15.05 which requires the Company to use the Best Available Control Technology for Toxics (T-BACT) to minimize toxic air pollutants.
- (f) COMAR 26.11.15.06 which prohibits the discharge of toxic air pollutants to the extent that the emissions endanger human health.
- (g) COMAR 26.11.19.23C which contains the following limitations:
- i) The Volatile Organic Compound (VOC) content of coatings used for vehicle refinishing shall not exceed the following:
 

Coating	VOC lbs/gal
(A) Pretreatment	6.5
(B) Precoat	5.5
(C) Primer surfacer	4.8
(D) Primer sealer	4.6
(E) Topcoat	5.0
(F) Multi-stage coating system	5.2
(G) Specialty coating	7.0
  - ii) All coatings standards established in this regulation apply to coatings as used at the coating application equipment.
- (h) COMAR 26.11.19.23E which restricts the use of specialty coatings to not more than 5.0 percent by volume of all coatings applied on a monthly basis.
- (i) COMAR 26.11.19.23F which requires the use of a controlled air spray system for applying coatings.
- (j) COMAR 26.11.19.23G which requires the Company to do the following for cleanup and surface preparation:
- (i) Store cleanup and surface preparation materials containing VOC in closed containers;
  - (ii) Store VOC-contaminated cloth and paper in closed containers;
  - (iii) Use enclosed containers or VOC recycling equipment to clean paint spray gun equipment and paint lines;
  - (iv) Except for plastic parts preparation, use preparation materials that contain not more than 1.4 pounds of VOC per gallon (0.17 kilograms/liter) of material; and
  - (v) For plastic parts preparation, use preparation materials that contain not more than 6.5 pounds of VOC per gallon (0.78 kilograms/liter) of material.

HIST004  
SERIAL-M000028629  
CUST#-37574 V.M.F.-POSTAL SERVICE

THE KUNKEL SERVICE COMPANY  
VOC REPORT - SALES STARTING 01/01/02 THRU 11/19/03

PRINTED 8:59 11/19/03

ROSSI, TIM

PAGE 1

DETAIL VND CODE-\*ALL SUM CODE-\*ALL CLASS-\*ALL VND ABC CODE-\*ALL KSC ABC CODE-\*ALL CLK-\*ALL  
STORE#-\*ALL

From Larry  
Paint Shop

PRODUCT NUMBER	CLS	DESCRIPTION	TOT.QTY	TOT.VOCLB	INV DATE	INVOICE#
DU 389S QT S		IMRON 5000 - G	1	2.00	07/08/02	F 198989
DU 389S QT S		IMRON 5000 - G	1	2.00	04/01/03	F 209573
DU 459S PT S		ANTI-CRATER ADDITIVE G	1	.81	04/01/03	F 209573
DU 615S 01 S		VARIPRIME SELF-ETCHING PRIMER	1	5.20	11/07/02	F 204423
DU 615S 01 S		VARIPRIME SELF-ETCHING PRIMER	1	5.20	09/09/02	F 201864
DU 616S 01 S		VARIPRIME MEDIUM CONVERTER	1	6.50	11/07/02	F 204423
DU 616S 01 S		VARIPRIME MEDIUM CONVERTER	1	6.50	09/09/02	F 201864
DU 616S 01 S		VARIPRIME MEDIUM CONVERTER	1	6.50	04/01/03	F 209573
DU 625S 01 S		L/F C/F VARIPRIME PRIMER	1	5.20	04/01/03	F 209573
DU 795S QT S		3.5 ACTIVATOR-CENTARI 5000	1	.72	11/07/02	F 204423
DU 795S QT S		3.5 ACTIVATOR-CENTARI 5000	1	.72	08/01/02	F 200152
DU 795S QT S		3.5 ACTIVATOR-CENTARI 5000	1	.72	08/06/02	F 200378
DU 795S QT S		3.5 ACTIVATOR-CENTARI 5000	2	1.44	07/09/03	F 213741
DU 795S QT S		3.5 ACTIVATOR-CENTARI 5000	1	.72	08/07/03	F 214924
DU 795S QT S		3.5 ACTIVATOR-CENTARI 5000	1	.72	10/16/03	F 217622
DU 795S QT S		3.5 ACTIVATOR-CENTARI 5000	1	.72	10/21/03	F 217765
DU 795S QT S		3.5 ACTIVATOR-CENTARI 5000	2	1.44	07/01/02	F 198710
DU 795S QT S		3.5 ACTIVATOR-CENTARI 5000	2	1.44	04/01/03	F 209573
DU MIXMV QT X		CENTARI 5000	1	.87	05/12/03	F 211283
DU MIXMV 01 X		CENTARI 5000	1	3.50	07/18/03	F 214134
DU MIXMV 01 X		CENTARI 5000	1	3.50	10/16/03	F 217622
DU 2510S 01 S		PRIMER/SEALER,EPOXY,LEAD FREE	1	4.50	09/09/02	F 201864
DU 2510S 01 S		PRIMER/SEALER,EPOXY,LEAD FREE	1	4.50	08/07/03	F 214924
DU 2510S 01 S		PRIMER/SEALER,EPOXY,LEAD FREE	1	4.50	10/21/03	F 217765
DU 2510S 01 S		PRIMER/SEALER,EPOXY,LEAD FREE	1	4.50	07/01/02	F 198710
DU 3401S 01 S		IMRON 6000 CLEAR BLENDER	1	6.90	03/06/03	F 208534
DU 3602S 01 S		ACRYLIC LACQUER THINNER, SLOW	1	6.80	12/10/02	F 205584
DU 3602S 01 S		ACRYLIC LACQUER THINNER, SLOW	1	6.80	10/08/02	F 203156
DU 3602S 01 S		ACRYLIC LACQUER THINNER, SLOW	1	6.80	10/06/03	F 217175
DU 3608S 01 S		THINNER,ACRYLIC LACQUER FAST	1	6.80	06/19/02	F 198168
DU 3608S 05 S		THINNER,ACRYLIC LACQUER FAST	1	34.00	10/08/02	F 203156
DU 3608S 05 S		THINNER,ACRYLIC LACQUER FAST	1	34.00	08/01/02	F 200152
DU 3608S 05 S		THINNER,ACRYLIC LACQUER FAST	1	34.00	10/06/03	F 217175
DU 3924S 05 S		GUN CLEANER E	1	32.00	04/01/03	F 209573
DU 3949S 01 S		LOW VOC CLEANER A	1	.40	11/07/02	F 204423
DU 3949S 01 S		LOW VOC CLEANER	1	.40	06/19/02	F 198168
DU 8100S 01 S		A/E REDUCER, HIGH PEMP. } E	1	7.30	03/06/03	F 208471
DU 8100S 01 S		A/E REDUCER, HIGH PEMP. } E	1	7.30	03/06/03	F 208544
DU MIXMVH QT X		CENTARI 5000	1	.87	01/28/03	F 207255
DU MIXMVH QT X		CENTARI 5000	1	.87	03/06/03	F 208471
DU MIXMVH 01 X		CENTARI 5000	1	3.50	11/07/02	F 204423
DU MIXMVH 01 X		CENTARI 5000	2	7.00	08/01/02	F 200152
DU MIXMVH 01 X		CENTARI 5000	1	3.50	08/06/02	F 200378
DU MIXMVH 01 X		CENTARI 5000	1	3.50	07/09/03	F 213741
DU MIXMVH 01 X		CENTARI 5000	1	3.50	07/09/03	F 213741
DU MIXMVH 01 X		CENTARI 5000	1	3.50	08/07/03	F 214924
DU MIXMVH 01 X		CENTARI 5000	1	3.50	10/21/03	F 217765
DU MIXMVH 01 X		CENTARI 5000	1	3.50	07/01/02	F 198710
DU MIXMVH 01 X		CENTARI 5000	1	3.50	07/01/02	F 198710
DU MIXMVH 01 X		CENTARI 5000	1	3.50	04/01/03	F 209573
DU		DUPONT PAINT				

VENDOR TOTAL-

283.56 LBS.

LISTG04

SERIAL-M000028629

CUST#-37574 V.M.F.-POSTAL SERVICE

DETAIL

VND CODE-\*ALL SUM CODE-\*ALL CLASS-\*ALL VND ABC CODE-\*ALL KSC ABC CODE-\*ALL CLK-\*ALL

STORE#-\*ALL

THE KUNKEL SERVICE COMPANY

VOC REPORT - SALES STARTING 01/01/02 THRU 11/19/03

PRINTED 8:59 11/19/03

PAGE 2

ROSSI, TIM

PRODUCT NUMBER	CLS	DESCRIPTION	TOT.QTY	TOT.VOCLB	INV DATE	INVOICE#
NN 441-20 01	S	FAST FUL-BASE REDUCER	1	6.60	03/18/03	F 209007
NN 441-22 01	S	SLOW FUL-BASE REDUCER	1	6.80	08/12/03	F 215107
NN 481-16 05	S	THINNER,NASON SELECT	1	6.80	07/01/02	F 198710
NN 483-11 PT	S	FUL-CRYL CAT II CATALYST	1	2.20	08/12/03	F 215107
NN 483-11 PT	S	FUL-CRYL CAT II CATALYST	1	2.20	03/18/03	F 209007
NN	NASON PAINT		VENDOR TOTAL-	24.60	LBS.	
S+ 38061	G	GLOSS BLACK,GALLON	1	3.50	10/08/02	F 203156
S+ 38064	C	GLOSS BLACK QUART		.00	06/19/02	F 198168
S+ 38064	C	GLOSS BLACK QUART	1	3.50	06/19/02	F 198217
S+ 38161	G	RUST-SHIELD,J DEERE YEL'W GAL	1	3.50	12/10/02	F 205584
S+ 38161	G	RUST-SHIELD,J DEERE YEL'W GAL	1	3.50	11/07/02	F 204423
S+ 38161	G	RUST-SHIELD,J DEERE YEL'W GAL	1	3.50	10/08/02	F 203156
S+ 38161	G	RUST-SHIELD,J DEERE YEL'W GAL	1	3.50	10/06/03	F 217175
S+ 38161	G	RUST-SHIELD,J DEERE YEL'W GAL	1	3.50	10/06/03	F 217211
S+ 38164	C	RUST-SHIELD,J DEERE YL'W QRT	1	3.50	09/17/02	F 202233
S+ 38171	G	RUST CONTROL COAT BARR PRIME	1	3.50	06/19/02	F 198168
S+ SEM			VENDOR TOTAL-	31.50	LBS.	
3M 05960	A	SPOT PUTTY 21OZ TUBE	1	3.70	10/24/02	F 203830
3M 05966	A	ACRYL RED 21OZ TUBE	1	3.80	09/09/02	F 201864
3M 08908	A	STRIPE ADHESIVE REMOVER	1	5.80	10/28/02	F 203989
3M 3M			VENDOR TOTAL-	13.30	LBS.	
			CUSTOMER TOTAL-	352.96	LBS.	



## DEPARTMENT OF THE ENVIRONMENT

AIR AND RADIATION MANAGEMENT ADMINISTRATION  
2500 BROENING HIGHWAY  
BALTIMORE, MARYLAND 21224

Parris N. Glendening  
Governor

Jane Nishida  
Secretary

☒

Construction Permit

☐

Operating Permit

PERMIT NO. 24-6-1502 N

Date Issued March 25, 1997  
In accordance with

PERMIT FEE \$500.00 (PAID)

Expiration Date COMAR 26.11.02.04B

## LEGAL OWNER &amp; ADDRESS

United States Postal Services  
60 W. Oliver Street  
Baltimore MD 21201  
Attn: Donald W. Evick, Proj. Mgr.


## SITE

SAME  
Baltimore City  
Premises #2427

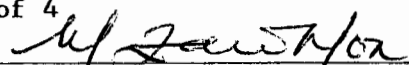
## SOURCE DESCRIPTION

Installation of one (1) Eagle paint spray booth for auto refinishing.

This source is subject to the conditions described on the attached pages.

  
Program Manager

Page 1 of 4

  
Director, Air and Radiation Management Administration

STATE OF MARYLAND  
DEPARTMENT OF THE ENVIRONMENT  
Air and Radiation Management Administration  
2500 Broening Highway  
Baltimore, Maryland 21224

Permit to Construct ☒  
Registration Update ☐  
Initial Registration ☐

APPLICATION FOR PROCESSING/MANUFACTURING EQUIPMENT

<b>1A OWNER OF EQUIPMENT /COMPANY NAME</b> <u>United States Postal Services</u>		<b>DO NOT WRITE IN THIS BLOCK</b> <b>2 REGISTRATION NUMBER</b>	
<b>MAILING ADDRESS/STREET</b> <u>60 W. Oliver St.</u>		<b>County No.</b> <div style="border: 1px solid black; padding: 2px; display: inline-block;">24</div> <small>1-2</small>	<b>Premises No.</b> <div style="border: 1px solid black; padding: 2px; display: inline-block;">2427</div> <small>3-6</small>
<b>CITY</b> <u>Baltimore</u>	<b>STATE</b> <u>MD</u>	<b>Registration Class</b> <div style="border: 1px solid black; padding: 2px; display: inline-block;">6</div> <small>7</small>	<b>Equipment No.</b> <div style="border: 1px solid black; padding: 2px; display: inline-block;">1502</div> <small>8-11</small>
<b>TELEPHONE NUMBER</b> ( <u>410</u> ) <u>625-8932</u>		<b>DATA YEAR</b> <div style="border: 1px solid black; padding: 2px; display: inline-block;">96</div> <small>12-13</small>	
<b>SIGNATURE</b>		<b>APPLICATION DATE</b>	
<b>1B EQUIPMENT LOCATION AND TELEPHONE NUMBER (IF DIFFERENT FROM ABOVE)</b>			
<u>60 W. Oliver St.</u>			
<b>STREET #, STREET NAME</b>	<b>CITY, TOWN</b> <u>Baltimore</u>	<b>STATE</b> <u>MD</u>	<b>ZIP</b> <u>21201</u>
<b>TELEPHONE</b> <u>(410) 625-8932</u>			
<b>PREMISES NAME (IF DIFFERENT FROM ABOVE)</b> <u>USPS - 60 WEST OLIVER STREET</u>			
<b>3 STATUS</b>			
A. NEW EQUIPMENT B. MODIFICATION TO EXISTING EQUIPMENT C. EXISTING EQUIPMENT	<b>STATUS</b> <div style="border: 1px solid black; width: 20px; height: 20px; margin: 0 auto;"></div> <small>15</small>	<b>New Construction Begun MONTH/YEAR</b> <div style="border: 1px solid black; padding: 2px; display: inline-block;">0595</div> <small>16-19</small>	<b>New Construction Completed MONTH/YEAR</b> <div style="border: 1px solid black; padding: 2px; display: inline-block;"></div> <small>20-23</small>
<b>4 DESCRIBE THIS EQUIPMENT: MAKE, MODEL, FEATURES, MANUFACTURER; INCLUDE MAXIMUM HOURLY INPUT RATE, ETC.</b> <u>EAGLE SPRAY BOOTH, MODEL # ECST-44-1-6-B-HDT, TRUCK CROSS FLOW SPRAY BOOTH</u>			
<b>5 WORKMEN'S COMPENSATION COVERAGE</b> <u>- COMPANY</u>		<b>EXPIRATION DATE</b> <u>NOTE</u>	
<b>BINDER/POLICY NUMBER</b>		<b>6 A. NUMBER OF PIECES OF IDENTICAL EQUIPMENT UNITS TO BE REGISTERED/PERMITTED AT THIS TIME</b> <u>ONE</u>	
<b>B. NUMBER OF STACKS/EMISSION POINTS ASSOCIATED WITH THIS EQUIPMENT</b> <u>ONE</u>		<b>7 PERSON INSTALLING THIS EQUIPMENT (IF DIFFERENT FROM (1) ABOVE)</b>	
<b>NAME</b> <u>Mr. Howard Synder</u> <b>TITLE</b> _____			
<b>COMPANY</b> <u>H.J. Synder, Inc.</u>			
<b>MAILING ADDRESS/STREET</b> <u>2015 West 41st Street</u>			
<b>CITY, TOWN</b> <u>Baltimore</u>		<b>STATE</b> <u>MD</u> <b>ZIP</b> <u>21211</u>	
<b>TELEPHONE</b> <u>(410) 332-0777</u>			



## 8 MAJOR ACTIVITY, PRODUCT OR SERVICE OF COMPANY AT THIS LOCATION

To paint United States Postal Services Vehicles.

SIC-4311-9

## 9 CONTROL DEVICES ASSOCIATED WITH THIS EQUIPMENT

NONE

☐

24-0

SIMPLE/MULTIPLE  
CYCLONE☐

24-1

SPRAY/ADSORB  
TOWER☐

24-2

VENTURI  
SCRUBBER☐

24-3

CARBON  
ADSORBER☐

24-4

ELECTROSTATIC  
PRECIPITATOR☐

24-5

BAGHOUSE

☐

24-6

THERMAL/CATALYTIC  
AFTERBURNER☐

24-7

DRY  
SCRUBBER☐

24-8

OTHER

☒

DESCRIBE

One exhaust filter section.

24-9

## 10 ANNUAL FUEL CONSUMPTION FOR THIS EQUIPMENT

OIL - 1000 GALLONS

26-31

SULFUR %

32-33

GRADE

34

NATURAL GAS - 1000 FT<sup>3</sup>

35-41

LP GAS - 100 GALLONS

42-45

GRADE

A  
B  
C  
D  
E  
F

COAL - TONS

46-52

SULFUR %

53-55

ASH %

56-58

WOOD - TONS

59-63

MOISTURE %

64-65

Other Fuels

☐

Annual Amount Consumed

(Specify Type)

66-1

Other Fuel

☐

Annual Amount Consumed

(Specify Type)

66-2

(Specify Units)

1 = Coke

2 = COG

3 = BFG

4 = Other

## 11 OPERATING SCHEDULE [for this equipment]

CONTINUOUS  
OPERATION☐

67-1

BATCH  
PROCESS☒

67-2

HOURS  
PER BATCH

68-69

BATCH  
PER WEEKHOURS  
PER DAY

70-71

DAYS  
PER WEEK

72

DAYS  
PER YEAR

73-75

1 hr in 8 hrs

## SEASONAL VARIATION IN OPERATION:

NO VARIATION

☒

76

WINTER PERCENT

77-78

SPRING PERCENT

79-80

SUMMER PERCENT

81-82

FALL PERCENT

83-84

(TOTAL SEASONS = 100%)

## 12 EQUIVALENT STACK INFORMATION - IS EXHAUST THROUGH DOORS, WINDOWS, ETC., ONLY?

☐

Y OR N

85

HEIGHT ABOVE  
GROUND (FT)

86-88

INSIDE DIAMETER  
AT TOP (INCHES)

89-91

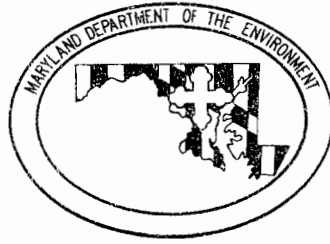
EXIT  
TEMPERATURE (°F)

92-95

EXIT  
VELOCITY (FT/SEC)

96-98

IF NOT, THEN →



Air and Radiation Management Administration  
(410) 631-3230

Form 5A: Summary of Demonstrations  
for Meeting the Ambient Impact  
Requirement (26.11.15.05) and the  
T-BACT Requirement (26.11.15.06)

DO NOT WRITE IN THIS SPACE

--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--

Company Name United States Postal Services

1. Summary of T-BACT Demonstration: List all emission reduction options considered in determining T-BACT starting with the option that reduces emissions the most. Supporting documentation **must** be attached.

	EMISSION REDUCTION OPTION	% EMISSION REDUCTION	COSTS	
			CAPITAL	ANNUAL OPERATING
1.	Gun Cleaner			
2.	Paint Mixing Machine			
3.	HVLP Spray Guns			
4.	High Solids Paints ✓			
5.				

2. Identify the emission reduction option selected as T-BACT and briefly explain why this is the best selection. Supporting documentation **must** be attached.

We use gun cleaner and paint mixing machine.



3. List screening levels and highest estimated off-site concentrations (ug/m<sup>3</sup>) resulting from **premises-wide allowable emissions** (1) of each Toxic Air Pollutant that is covered by the regulations and discharged from the installation or source applying for the permit. See the General Instructions for more detail. Supporting documentation **must** be attached.

	TOXIC AIR POLLUTANT	CAS NUMBER	SCREENING LEVEL(S)			OFF-SITE CONCENTRATIONS		
			1-HR	8-HR	ANNUAL	1-HR	8-HR	ANNUAL
1								
2	See Air Toxics Summary Sheet							
3								
4								
5								
6								
7								
8								
9								
10								
11								
12								
13								
14								
15								
16								

If unable to use a Screening Analysis, check the box, and attach the Second Tier Analysis or Special Permit request to this form. ☐

- (1) **Premises** is defined as: "all the installations or other sources that are located on contiguous or adjacent properties and that are under the control of one person or under common control of a group of persons" (COMAR 26.11.15.01B (12)).

**Allowable Emissions** are defined as: "the maximum emissions a source or installation is capable of discharging after consideration of any physical or operational limitations required by this subtitle or by enforceable conditions included in an applicable air quality permit to construct, permit to operate, secretarial order, plan for compliance, consent agreement, or court order" (COMAR 26.11.15.01B (2)).

Main Vehicle Maintenance Facility  
60 West Oliver Street  
Baltimore, Maryland 21234-9998

## **ASBESTOS/LEAD-IN-PAINT/RADON SURVEY REPORT**

PREPARED FOR:

United States Postal Service  
Baltimore District  
900 E. Fayette Street  
Baltimore, MD 21233-9126



REPORT PREPARED AND SUBMITTED BY:

Apex Environmental, Inc.  
15850 Crabbs Branch Way  
Rockville, MD 20855

DATE(S) OF INSPECTION:

June 3 and 4, 1996

**UNITED STATES POSTAL SERVICE  
ASBESTOS SURVEY**

**SURVEY CONTRIBUTORS / CONTRACT INFORMATION**

USER AGENCY: THE UNITED STATES POSTAL SERVICE  
FACILITY NAME: MAIN VEHICLE MAINTENANCE FACILITY  
FINANCE/SUB #: MAIN VMF  
FACILITY ADDRESS: 60 WEST OLIVER STREET  
  
BALTIMORE, MD 21201-9998  
  
FACILITY TELEPHONE #: (410) 625-8931  
USPS SITE CONTACT: LEONARD PETERS  
DATE OF SURVEY: 06/03/1996  
  
CONSULTING FIRM NAME: APEX ENVIRONMENTAL, INC.  
CONSULTING FIRM ADDRESS: 15850 CRABBS BRANCH WAY  
SUITE 200  
ROCKVILLE, MD 20855-  
  
CONSULTING FIRM PHONE #: (301) 417-0200  
CONTRACT NUMBER: 232098-J-0033  
PROJECT NUMBER: X10910  
WORK ORDER NUMBER: 5.00  
LABORATORY ADDRESS: SCIENTIFIC LABORATORIES, INC.  
42 WEST 24TH STREET  
NEW YORK, NY 10010-  
  
LABORATORY PHONE #: (212)741-2053

The following Asbestos Survey Report was compiled and written by:

Inspector's Signature: 

RAFAEL LOPEZ

EPA Accredited Building Inspector

State Accreditation No.: 23723

This Asbestos Survey was reviewed by Matthew R. Van Patten, PE

Reviewer's Signature: 

## EXECUTIVE SUMMARY

---

Apex Environmental, Inc. (Apex) was retained by the U.S. Postal Service (USPS) to perform inspection services at the main Vehicle Maintenance Facility (VMF) located at 60 West Oliver Street, Baltimore, Maryland. The facility was inspected for the presence of asbestos, lead-based paint (LBP), and radon on June 3 and 4, 1996.

### ASBESTOS

All accessible areas of the main VMF were inspected for suspect asbestos-containing building materials (ACBMs). A total of 27 bulk samples were collected of suspect ACBMs. Analytical results confirmed that asbestos is not present in any of the identified suspect materials observed. However, assumed asbestos-containing pipe insulation was observed outside the building above the gas pumps. This aircell-insulated pipe was approximately 100 feet long leading from the main building to the gas pumps then bending to the right. No samples could be taken due to the unreachable height. In addition, asbestos was assumed, not confirmed, to be present in identified fire doors within the building. These doors were identified by the fire rating plates located on the respective door jambs, see Asbestos Section C, Homogeneous Materials Summary by Functional Floor and Area Location). No areas of the building were found to have ACBMs causing high or imminent exposure potential.

### LEAD

Apex conducted a lead paint inspection at the main VMF using an X-ray fluorescence (XRF) direct-reading analyzer. A total of 90 readings were taken of suspect LBP surfaces. In addition, a total of six calibration readings were collected during the inspection. Results indicated that a total of four different types of painted surfaces tested contain LBP. The lead paint section of this report provides the specific locations and results of all analyses conducted.

### RADON

Apex did not conduct any monitoring for radon at the main VMF as all occupiable construction was above grade.

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**SURVEY CONTRIBUTORS/CONTRACT INFORMATION**

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**INTRODUCTION**

**BUILDING INFORMATION**

**PURPOSE AND SCOPE OF WORK**

**REPORT LAYOUT**

**PART I. ASBESTOS INSPECTION REPORT**

**INTRODUCTION**

**Asbestos Bulk Sampling Methodology**

**SECTION A**

**The Building Information Report  
The Functional Area Summary**

**SECTION B**

**Suspect Materials  
General Categories of Functional Areas Inspected**

**SECTION C**

**Functional Area Summary  
Inspector's Homogeneous Area Assessment Decision Tree  
Homogeneous Material Summary by Functional Floor And Area Locations  
Homogeneous Materials List**

**SECTION D**

**Bulk Sample Summary Table  
Bulk Sample Laboratory Analysis Forms  
Bulk Sample Chain-of-Custody Forms**

**SECTION E**

**Photographs of Homogeneous Sampling Areas**

**SECTION F**

**Cost Estimates**

**SECTION G**

**Laboratory and Personnel Certificates of Accreditation**

S

## MATERIAL SAFETY DATA SHEET

The purpose of this data sheet is to obtain technical information for each specific material from the manufacturer. This information is required to evaluate health, safety and environmental hazards, determine proper use, and make final recommendations for use of the material. The information requested will be kept confidential and closed only as necessary to meet requirements of the Occupational Safety and Health Act of 1970 or by any other Federal, State or Local regulations.

SECTION I	
MANUFACTURER'S NAME <b>THE UNITED OIL COMPANY, INC.</b>	EMERGENCY TELEPHONE <b>(301) 342-1200</b>
ADDRESS (Number, Street, City, State, and ZIP Code) <b>BALTIMORE 6 KRESSON STS., BALTIMORE, MD. 21224</b>	
CHEMICAL NAME AND SYNONYMS <b>SOLVENT REFINED PARAFFINIC DISTILLATES</b>	TRADE NAME AND SYNONYMS <b>DURALENE HYDRAULIC OIL</b>
CHEMICAL FAMILY <b>HYDROCARBON</b>	Formulation <b>PROPRIETARY</b>

SECTION II - HAZARDOUS INGREDIENTS			
PAINTS, PRESERVATIVES & SOLVENTS	%	TLV (Units)	ALLOYS AND METALLIC COATINGS
Pigments			Base Metal
Catalyst			Alloys
Vehicle			Metallic Coatings
Solvents			Filler Metal Plus Coating or Core Flux
Additives	1		Others
Others	REFINED MINERAL OILS 99		
HAZARDOUS MIXTURES OF OTHER SOLVENTS			
NOT APPLICABLE			

SECTION III - PHYSICAL DATA		
Boiling Point (°F)	<b>WIDE</b>	Specific Gravity (H <sub>2</sub> O = 1)
Vapor Pressure (mm Hg.)	<b>BELOW</b>	Percent (Volume by Volume) (%)
Vapor Density (Air = 1)	<b>14+</b>	Evaporation Rate (ETHYL ETHER)
Solubility in Water	<b>INSOLUBLE</b>	
Appearance and Odor		

SECTION IV - FIRE AND EXPLOSION HAZARD DATA		
Flash Point (Method used) <b>435 °F (COC) MIN.</b>	Flammable Limits	<b>18% NOT D</b>
Extinguishing Media <b>WATER FOG, CHEMICAL FOAM, DRY CHEMICAL, CO<sub>2</sub></b>		
Special Fire Fighting Procedures <b>WEAR SELF CONTAINED BREATHING GEAR WHEN FIGHTING IN CONFINED SPACES.</b>		
Unusual Fire and Explosion Hazards		



SECTION V - HEALTH HAZARD DATA	
Threshold Limit Value	NO OSHA STANDARD OR THRESHOLD LIMIT VALUE HAS BEEN ESTABLISHED FOR THIS PRODUCT.
Effects of Overexposure	INHALATION - NONE EXPECTED TO 25 MG. OIL MIST PER CUMETER OF AIR, PRACTICALLY NON-TOXIC BY SKIN ABSORPTION, MILD EYE IRRITATION.
Emergency and First Aid Procedures	INHALATION - NONE NORMALLY REQUIRED, SKIN - WASH WITH SOAP AND WATER, EYES - IMMEDIATELY FLUSH EYES WITH PLENTY OF WATER FOR AT LEAST 15 MINUTES. IF REDNESS OR IRRITATION PERSISTS, MEDICAL HELP.

SECTION VI - REACTIVITY DATA			
Stability	Unstable		Conditions to Avoid
	Stable	X	
Incompatibility (Materials to avoid) STRONG OXIDIZERS MAY PRODUCE OXIDES OF CARBON, PHOSPHORUS, SULFUR, ZINC, HYDROGEN SULFIDE, AND CALCIUM.			
Hazardous Decomposition Products			
Hazardous Polymerization	May Occur		Conditions to Avoid
	Will Not Occur	X	

SECTION VII - SPILL OR LEAK PROCEDURES	
Steps to be Taken in Case Material is Released or Spilled	CONTAIN SPILL. CLEAN UP USING AN OIL ABSORBENT.
Waste Disposal Method	FEDERAL, STATE, AND LOCAL REGULATIONS COVER DISPOSAL.

SECTION VIII - SPECIAL PROTECTION INFORMATION			
Respiratory Protection (Specify type) CONCENTRATION IN AIR DETERMINES PROTECTION			
Ventilation	Local Exhaust	VENTILATE AS NEEDED TO MAINTAIN WORKPLACE ENVIRONMENTAL LIMIT	Special
	Mechanical (General)		Other
Protective Gloves	RECOMMENDED	Eye Protection	RECOMMENDED
Other Protective Equipment IF CONTACT IS UNAVOIDABLE, WEAR OIL IMPERVIOUS CLOTHING.			

SECTION IX - SPECIAL PRECAUTIONS	
Precautions to be Taken in Handling and Storing	KEEP AWAY FROM FIRE, SPARKS, AND FLAMES. STORAGE PER NFPA CLASS III B.
Other Precautions	

IF SWALLOWED, DO NOT INDUCE VOMITING  
CALL A PHYSICIAN IMMEDIATELY.

FOR INFORMATION CALL

BOB CROKE.301/342-1

United States Postal Service  
Baltimore Vehicle Maintenance Facility  
60 W. Oliver St.  
Baltimore, Md. 21201-5783

Facility Representative: Leonard Peters  
Manager, Vehicle Maintenance

Date of Inspection: November 24, 2003

EPA Inspector: Gerard Crutchley  
(OECEJ, Ft. Meade, Md.)

## Part 5

# INSPECTOR CHECKLIST FOR INSPECTIONS OF FEDERAL FACILITIES FOR COMPLIANCE WITH SECTION 6002 OF THE RESOURCE CONSERVATION AND RECOVERY ACT

**Note to inspectors:** If the facility has no motor vehicle maintenance shop, please provide the Inspection Questionnaire to the facility and note on the top of this form that the facility does not maintain vehicles onsite. If the facility has more than one motor vehicle maintenance shop, please indicate whether the response to questions listed below reflect practices at the entire facility or only the shop(s) inspected.

### Re-refined oils and lubricants:

#### Background questions:

Approximately how many vehicles are serviced for replacement or addition of oils and lubricants by the shop or facility annually? ~1400

What type of vehicles are serviced? (e.g., sedans, trucks, heavy equipment, aircraft)

passenger vehicles (sedans), small postal delivery vehicles, LLVs  
cargo vans, and tractor trailers (long life vehicles)

#### Specific questions regarding use of oil and lubricants:

What is the estimated annual consumption of oil and lubricants in the shop?

Motor oil: 2,000 gallons

other lubricants: 700-800 gallons

Approximately how frequently is the engine oil replaced in facility vehicles?

Every \_\_\_\_\_ miles or \_\_\_\_\_ months 26 week cycle for most vehicles  
6 week cycle for tractor trailers and cargo vans

Does the facility or shop test the oil to determine if replacement is needed?

yes \_\_\_\_\_ no X

Does the shop or facility use re-refined oil for replacement engine lubricating (motor) oils?

yes X no \_\_\_\_\_ 90% of the time. They use virgin oil for some of the tractor trailers because of manufacturer's specifications

Does the shop or facility use re-refined oil for replacement hydraulic fluids?

yes \_\_\_\_\_ no \_\_\_\_\_ N/A

Does the shop or facility use re-refined oil for replacement gear oils?

yes \_\_\_\_\_ no \_\_\_\_\_ use mostly synthetic

Do shop containers containing unused oils and other lubricants indicate these products are re-refined?

Oil - yes ☒ no ☐

Hydraulic fluids - yes ☐ no ☒ N/A

Gear oils - yes ☒ no ☐

Is the shop or facility aware of the RCRA/CPG requirement to use re-refined oils or lubricants?  
yes ☒ no ☐

If the facility is aware of the requirement to use re-refined oils and lubricants and still does not use these products, what is their explanation for not using these products?

Re-refined is too expensive ☐

Specifications don't allow use of re-refined ☒ (for some vehicles)

Re-refined is not available ☒ did not use it for a period of time because it was not available

Other ☐

Where does the shop or facility purchase oil and other lubricants?

Commercial bulk vendor (e.g., Safety Kleen) yes ☐ no ☐

Govt. vendor (e.g., DLA, GSA) yes ☒ no ☐

Local commercial vendor (e.g., auto supply) yes ☐ no ☐

Other ☐

Do shop or facility personnel purchase oil or other lubricants for use in the shop using a government charge card or account at a commercial vendor (e.g., K-Mart or Sears) outside of the facility? Always ☒ Occasionally ☐ Never ☐

What is the fate of used oil removed from the facility's vehicles?

Disposed of as hazardous waste ☐

Picked up by vendor for "recycling" ☒

Reused at facility for heating fuel ☐

Other ☐

If the oil is collected or sent out to a recycler, is it ultimately used for energy recovery or is it re-refined? Energy recovery ☒ Re-refined ☐ Don't know ☐

## RETREAD TIRES:

### Background questions:

Approximately how many tires does the shop or facility replace annually? ~ 2,000 - 3,000

What type(s) of replacement tires does the shop or facility use?

Bus yes \_\_\_\_\_ no \_\_\_\_\_  
Heavy truck yes ☒ no \_\_\_\_\_  
Pickup truck yes \_\_\_\_\_ no \_\_\_\_\_  
Passenger vehicle yes ☒ no \_\_\_\_\_  
Other cargo vans and LLVs

---

### Specific questions regarding the use of retread tires:

Does the shop or facility install retread tires on facility vehicles onsite? yes ☒ no \_\_\_\_\_  
If yes, for which types of tires?

Bus \_\_\_\_\_  
Heavy truck ☒  
Pickup truck \_\_\_\_\_  
Passenger vehicle \_\_\_\_\_  
Other cargo vans and LLVs

Does the shop or facility have in place an agreement or contract with a "retreader" to retread the facility's tires? yes ☒ no \_\_\_\_\_

Does the shop or facility use an outside service or vendor for tire replacement?

yes ☒ no \_\_\_\_\_ occasionally  
If yes, does that vendor offer retread tires? yes \_\_\_\_\_ no \_\_\_\_\_ don't know \_\_\_\_\_  
If yes, does the facility purchase these tires? yes ☒ no \_\_\_\_\_

Is the shop or facility aware of the RCRA/CPG requirement to use retread tires?

yes ☒ no \_\_\_\_\_

If the shop or facility is aware of the requirement to do so yet still do not use retread tires, what is the explanation for not using these products?

Retread tires are "unsafe" \_\_\_\_\_  
Specifications don't allow use of retread tires \_\_\_\_\_  
Retread tires are not available to the facility ☒ (for sedans)  
Other \_\_\_\_\_

Does the shop or facility purchase retread tires for use in the shop using a government charge card or account at a commercial vendor (e.g., Bandag, Goodyear, or other retreader) outside of the facility? Always X Occasionally \_\_\_\_\_ Never \_\_\_\_\_

How are used tires disposed of by the facility?

sent to the retreader

## ENGINE COOLANTS:

### Background questions:

Approximately how many vehicles are serviced for replacement or addition of coolants by the shop or facility annually? 600-700

What type of vehicles are serviced? (e.g., sedans, trucks, heavy equipment)

passenger vehicles (sedans), small postal delivery vehicles, LTV's  
cargo vans and tractor trailers (long life vehicles)

### Specific questions regarding shop or facility use of engine coolants:

Where does the shop or facility purchase coolant (reclaimed or virgin)?

Commercial bulk vendor (e.g., Safety Kleen) yes \_\_\_\_\_ no \_\_\_\_\_

Govt vendor (DLA, GSA) yes \_\_\_\_\_ no \_\_\_\_\_

Local commercial vendor (e.g. auto supply) yes X no \_\_\_\_\_

Other \_\_\_\_\_

Approximately how frequently is the coolant changed in each vehicle?

Every \_\_\_\_\_ miles or 24 months?

What is the estimated average annual usage of coolant in this shop or facility?

700 gallons

Does the shop or facility use reclaimed engine coolant?

yes X no \_\_\_\_\_

Does the shop or facility have in place an agreement or contract with a vendor to reclaim the facility's used coolant? yes X no \_\_\_\_\_

Does the shop or facility have on-site, a reclamation device to reclaim used coolant?

yes \_\_\_\_\_ no X

Is the shop aware of the RCRA/CPG requirement to use reclaimed coolant? yes X no \_\_\_\_\_

If the facility is aware of the requirement to do so yet still do not use reclaimed coolant, what is the explanation for not using this product?

Reclaimed coolant is not effective \_\_\_\_\_

Specifications don't allow use of reclaimed coolant \_\_\_\_\_

Reclaimed coolant is not available to the facility X (at times)

Coolant reclamation devices are too costly \_\_\_\_\_

Other \_\_\_\_\_

Does the facility purchase coolant (reclaimed or virgin) for use in the shop using a government charge card at a commercial vendor (e.g., K-Mart or Sears) outside of the facility?

How does the facility dispose of coolant that is removed from facility vehicles (and is not reclaimed)? N/A

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Please add any additional observations regarding this inspection.

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The completed checklist should be mailed to:

US Environmental Protection Agency  
Region III  
State Programs Branch Chief (3WC21)  
1650 Arch Street  
Philadelphia, PA. 19103